

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MIAMI DIVISION

JANE DOE,

CASE NO: CASE NO: 1:25-cv-20757 JB

Plaintiff,

v.

STEVEN BONNELL II,

Defendant.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Joan Schlump Peters of the law firm of JSP Law, LLC, 4819 W. Blvd Ct., Naples, FL 34103, tel. no. 305-299-4759, for purposes of appearance as co-counsel on behalf of Plaintiff Jane Doe in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Joan Schlump Peters to receive electronic filings in this case, and in support thereof states as follows:

1. Joan Schlump Peters is not admitted to practice in the Southern District of Florida and is a member in good standing of the federal bar of the United States District Court for the District of Puerto Rico, where applicant practices law. Applicant's bar license number is 207409. Applicant is also admitted to the United States Court of Appeals for the First Circuit, and the bar of the State of New York (no. 2168417), and is a member in good standing.

JANE DOE v STEVEN BONNELL
CASE NO: CASE NO: 1:25-cv-20757 JB
Page 2

2. Movant, Carlos A. Garcia Perez, of the law firm of Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP, located at 201 Alhambra Circle, Suite 1205, Coral Gables, FL 33134, phone number (305)371-1000, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Joan Schlump Peters has made payment of this Court's \$250 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Joan Schlump Peters, by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Joan Schlump Peters at the email address: petersjoan@bellsouth.net.

JANE DOE v STEVEN BONNELL
CASE NO: CASE NO: 1:25-cv-20757 JB
Page 3

WHEREFORE, Carlos A. Garcia Perez, moves this Court to enter an Order allowing Joan Schlump Peters to appear before this Court on behalf of Plaintiff Jane Doe, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Joan Schlump Peters.

Date: February 27, 2025

Respectfully submitted,

**SANCHEZ-MEDINA, GONZALEZ, QUESADA,
LAGE, GOMEZ & MACHADO, LLP**

Attorney for Plaintiff

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/s/ Carlos A. Garcia Perez

By: _____
CARLOS A. GARCIA PEREZ
Florida Bar No. 106895
Attorney for Plaintiff